

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No.: 4:24-CV-10017-JEM

AKARI JOHNSON and
HAZEL THOMPSON,

Plaintiffs,

v.

MMI 82, LLC, and
THE ENTHUSIAST LLC,

Defendants.

**JOINT MOTION FOR AN EXTENSION OF TIME
TO FILE DAUBERT MOTIONS AND DISPOSITIVE MOTIONS**

Plaintiffs, AKARI JOHNSON and HAZEL THOMPSON (“Plaintiffs”), and Defendants, MMI 82, LLC, and THE ENTHUSIAST LLC (“Defendants”), by and through their respective undersigned counsel, pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, and all other applicable rules, orders, and case law, hereby file this *Joint Motion for An Extension of Time to File Daubert Motions and Dispositive Motions* (“Motion”), and as grounds state:

1. On May 31, 2024, the Court entered an Order Setting Civil Trial Date and Pretrial Schedule, Requiring Mediation, and Referring Certain Motions to Magistrate Judge (“Order”) [E.C.F. 13].
2. Per the Order, the deadline for filing Daubert motions and other dispositive motions is April 19, 2025.
3. However, at this juncture of litigation, the parties anticipate more time will be needed to adequately prepare their Daubert motions and dispositive motions.
4. Counsel for the parties have been in regular communication regarding this matter

and believe that it would be in the best interest of judicial economy and the appropriate presentation of this matter if the deadline for their Daubert motions and dispositive motions was extended forty-five (45) days, through and including June 3, 2025.

5. In addition, the parties have agreed to conduct mediation in this case on May 6, 2025 in a good faith effort to try to resolve this matter, shortly after the current deadline to file Daubert and Dispositive motions.

6. No parties would suffer any prejudice or inconvenience as a result of the relief requested in this Motion. To the contrary, the parties are jointly requesting the relief sought through this Motion.

7. The parties certify they are not seeking the requested relief for any improper purpose. Rather, they do so to provide all parties with sufficient opportunity to prepare the case and make an appropriate presentation to the Court and factfinder.

8. The parties certify that the requested extension will not affect the trial date, or any other deadline set forth in the Scheduling Order.

WHEREFORE, the Parties respectfully request this Court enter an Order granting this Motion, as reflected above, and granting any further relief this Court deems just and proper.

CERTIFICATION OF CONFERRAL UNDER LOCAL RULE 7.1 (A)(3)

Pursuant to Local Rule 7.1(a)(3), I hereby certify that On March 13, 2025, Counsel for the Defendants conferred with Plaintiff's counsel and jointly agreed to extending the Scheduling Order deadlines for Daubert motions and all other dispositive motions, through and including June 3, 2025.

[CERTIFICATE OF SERVICE ON FOLLOWING PAGE]

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by Florida Court E-Filing Portal on March 18, 2025:

Respectfully submitted jointly by:

<p>DEREK SMITH LAW GROUP, PLLC <i>Counsel for Plaintiffs</i> 520 Brickell Key Drive, Suite O-301 Miami, FL 33131 Office: 786- 688-2335 Fax: 786- 503-6741</p> <p>By: <u>/s/ Daniel J. Barroukh</u> DANIEL J. BARROUKH, ESQ. Florida Bar No. 1049271 Primary: Danielb@dereksmithlaw.com</p>	<p>ALMAZAN LAW <i>Counsel for Defendants</i> 7901 Ludlam Road, Suite 100 Miami, Florida 33143 Office: 305-665-6681 Fax: 305-665-6684</p> <p>By: <u>/s/ Johanna Castellon Vega</u> JOHANNA CASTELLON-VEGA, ESQ. Florida Bar No. 58345 Primary: jvega@almazanlaw.com Secondary: jweiss@almazanlaw.com</p> <p>ALEXANDER P. ALMAZAN, ESQ. Florida Bar No.: 159166 Primary: aalmazan@almazanlaw.com</p>
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